

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

MAGNOLIA ISLAND PLANTATION, L.L.C.	§	CIVIL ACTION NO: 5:18-cv-01526
and BARBARA MARIE CAREY LOLLAR	§	
	§	
Plaintiffs	§	
	§	
VS.	§	CHIEF JUDGE S. MAURICE HICKS, JR.
	§	
LUCKY FAMILY, L.L.C., W.A. LUCKY, III,	§	
And BOSSIER PARISH SHERIFF JULIAN	§	
C. WHITTINGTON, in his official capacity	§	
	§	MAGISTRATE JUDGE KAREN HAYES
Defendants	§	

**SHERIFF JULIAN WHITTINGTON'S MOTION FOR LEAVE TO FILE**  
**REVISED STATEMENT OF UNDISPUTED FACTS**

NOW INTO COURT, through undersigned counsel, comes Defendant, BOSSIER PARISH SHERIFF JULIAN C. WHITTINGTON ("the Sheriff"), who files this Motion for Leave to File Revised Statement of Undisputed Facts, asserting as follows:

1.

The Sheriff filed an Amended and Corrected Motion for Summary Judgment on January 7, 2020 (Doc. 96) after being granted leave of court to file same.

2.

Plaintiffs filed a Memorandum in Opposition (Doc. 103) to said Motion for Summary Judgment, and the Sheriff filed a Reply to said Memorandum on February 3, 2020 (Doc. 123).

3.

Attached as an exhibit to the Sheriff's Reply (Doc. 123) was a Revised Statement of Undisputed Facts (Doc. 123-4), which Plaintiffs have now moved to strike alleging that it impermissibly altered the substance of previous statements (Doc. 132).

4.

Because the Revised Statement of Undisputed Facts (Doc. 123-4) was revised to specifically address and rebut issues raised in Plaintiffs' Opposition, the Sheriff, out of an abundance of caution, seeks leave of court to file same.

WHEREFORE, Bossier Parish Sheriff Julian Whittington PRAYS that this Motion for Leave of Court be granted allowing The Sheriff to file a Revised Statement of Undisputed Facts, previously submitted as Doc. 123-4.

Respectfully submitted by:

LANGLEY & PARKS, LLC

By: S / Julianna P. Parks

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Sheriff of Bossier Parish***